## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT RENEWAL

## PERMITTEE

Herff Jones Cap & Gown Division

Attn: Gary Lovingfoss 1000 North Market Street Champaign, Illinois 61820

Applicant's Designation: EPA PERMITS Date Received: November 3, 2005

Subject: Cap and Gown Dry Cleaning

Date Issued: June 5, 2006 Expiration Date: June 5, 2011

Location: 1000 North Market Street, Champaign

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Equipment	Manufacturer	Number of Units	
Gown Washer	Washex	1	
Gown Dryer	ACECO	3	Backup-Hoyt/Dynamic
Gown Dryer	Dynamic	1	
Gown Dryer	Hoyt	5	
Cap Washer	Milnor	1	
Cap Extractor	Milnor	1	
Cap Extractor	Hammond	3	
Cap Washer	Hansvedt	1	
Cap Dryer	Rockwell-Ross	3	
Boiler A	Abco	1	
Boiler B and C	Vapor	2	Backups to Boiler A
360 Solvent Tank	2,000 gallon	1	
Mix/Recycle/Hold	Less than 1001	2	
Tanks	Gallon		

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., criteria pollutants less than 100 tons per year, individual HAPs to less than 10 tons per year and combined HAPs to less than 25 tons per year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2. Emissions and operation of all petroleum dry cleaning operations, including solvent tank and mix/recycle/hold tanks, shall not exceed the following limits:

Equipment Area	Solvent Usage (Gal/Yr)	VOM Content (Lbs/Gal)	VOM Emissions (Tons/Yr)
Gown Cleaning	25,505	6.43	82.0
Cap Cleaning	3 <b>,</b> 956	6.32	12.5
Misc. Cleaning	157	6.38	0.5
		Total:	95.0

These limits are based on the use of stoddard solvents only, any solvent reclaimed and shipped off-site considered to be solvent usage, maximum VOM contents and all VOM emitted. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 3. The petroleum dry cleaning machines are exempt from New Source Performance Standards (NSPS) for Petroleum Dry Cleaning Subpart JJJ, pursuant to 40 CFR 60.620, because all machines were constructed before December 14, 1982.
- 4. The petroleum dry cleaning machines are exempt from Title 35, Part 215, Subpart Z for Dry Cleaners pursuant to 35 Ill. Adm. Code 215.611 for petroleum dry cleaning facilities with actual emissions of less than 100 tons per year of VOM without control equipment.
- 5. At all times the Permittee shall also maintain and operate all equipment listed in this permit, in a manner consistent with good air pollution control practice for minimizing emissions.
- 6a. Boiler A is subject to a New Source Performance Standard (NSPS) for Small Industrial Steam Generating Units, 40 CFR 60, Subparts A and Dc. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
  - b. At all times, the Permittee shall maintain and operate Boiler A in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to 40 CFR 60.11(d).
- c. The Permittee shall not burn any fuel oil with a sulfur content greater than 0.5% by weight in Boiler A, pursuant to 40 CFR 60.42c(d).
- d. The Permittee shall fulfill applicable notification and recordkeeping requirements of NSPS 40 CFR 60.48c for Boiler A.

7. Emissions and operation of the 3 boilers shall not exceed the following limits:

Natural	Gas Usage	)	$NO_x$	C	0	S	$D_2$
(mmscf/Mo)	(mmscf/Y	r) (T/Mo	(T/Yr)	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
28	280	1.4	14	1.2	11.8	0.009	0.084
VO.	M	PM					
(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)				
0.08	0.8	0.1	1.1				

These limits are based on maximum fuel usage and standard AP-42 emission factors. Compliance shall be determined from a running total of the previous 12 months data.

- 8. The Permittee shall notify the Illinois EPA prior to any change in the type of fuel used at the source.
- 9. Natural gas shall be the only fuel(s) fired in the above referenced boilers.
- 10. No person shall cause or allow the emission of carbon monoxide into the atmosphere from each individual boiler to exceed 200 ppm corrected to 50% excess air in accordance with 35 Ill. Adm. Code 216.121.
- 11. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 12. The Permittee shall maintain monthly records of the following items:
  - a. Solvent usage (gallons/month and gallons/year);
  - b. VOM and HAP content of each solvent (lb/gallon);
  - Fuel type and consumption (mmscf and gallons/month and gallons/year); and
  - d. VOM and HAP emission calculations (tons/month and tons/year).
- 13. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records

retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

- 14. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 15. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency Division of Air Pollution Control Compliance Section (#40) P.O. Box 19276 Springfield, Illinois 62794-9276

 $\underline{\text{and}}$  one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency Division of Air Pollution Control 2009 Mall Street Collinsville, Illinois 62234

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E. Manager, Permit Section Division of Air Pollution Control

DES:RBS:psj

cc: Illinois EPA, FOS Region 3 Lotus Notes

## Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the source operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year of combined HAPs), at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

	HAPs						
Equip/Operation	VOM (Tons/Yr)	Single (Tons/Yr)	Combined (Tons/Yr)	NO <sub>x</sub> (Tons/Yr)	CO (Tons/Yr)	SO <sub>2</sub> (Tons/Yr)	PM (Tons/Yr)
Petroleum Dry Cleaning	95.00						
3 Boilers	0.80	<del></del>	<del></del>	<u>14</u> 14	11.8 11.8	0.084	<u>1.1</u> 1.1
3 Boilers Totals	0.80 96.24	< 10	< 25	$\frac{14}{14}$	$\frac{11.8}{11.8}$	0.084 0.084	$\frac{1.1}{1.1}$

RBS:psj